

Berger, Fischoff, Shumer, Wexler & Goodman, LLP  
Proposed Attorneys for the Debtor &  
Debtor-in-Possession  
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(516) 747-1136

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In re:

Chapter 11

RUDOLPH W. GIULIANI  
a/k/a RUDOLPH WILLIAM GIULIANI

Case No.: 23-12055

**“Lar Dan”**  
**Affidavit**

Debtor.

-----X  
STATE OF FLORIDA )ss;  
COUNTY OF PALM BEACH )

I, James Menges, hereby declare pursuant to 28 U.S.C. §1746 that the following statements are true and correct to the best of my knowledge and belief after due inquiry as detailed herein:

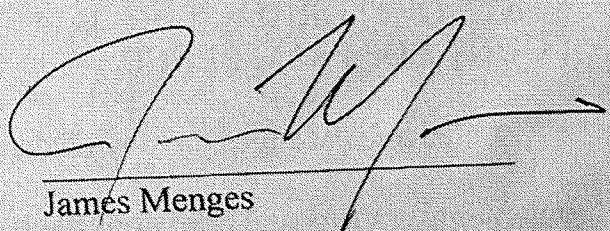
1. I am the Trustee of the Giuliani Freedom Fund Legal Defense T.R. Fund “Giuliani Freedom Fund”. From the period August 8, 2021 through December 26, 2023 The Giuliani Freedom Fund Legal Defense T.R. Fund has paid to the Law Firm of Aidala Bertuna & Kamins, P.C. \$214,518.00 towards legal fees incurred by Aidala, Bertuna & Kamins, P.C. The fees were paid in connection with the Firm’s representation of the Debtor in connection with several search warrant cases, and attorney disciplinary proceedings pending in New York State and the District of Columbia. Giuliani Freedom Fund waives any and all reimbursement and/or indemnification

f the \$214,518 of the legal fees paid on behalf of the Debtor.

2. I understand that the law firm of AB&K (the "Firm") has been retained to represent the Debtor. I also understand that the Firm's obligation is solely for the representation of the Debtor to the exclusion of any other entity or individual, including the Giuliani Freedom Fund.

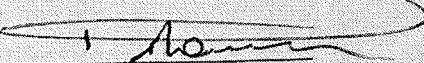
3. Giuliani Freedom Fund is not a creditor of the Debtor. Other than assisting the Debtor with payments of legal fees to the AB&K firm and other firms, the Giuliani Freedom Fund has no relationship with the Debtor.

4. Giuliani Freedom Fund does not intend to bid on any assets of the Debtor and does not intend to provide any financing to the Debtor beyond the payment of legal fees to Aidala, Bertuna & Kamins, P.C. or on any other retained professionals whose retention on similar terms has been or will be approved.



James Menges

Sworn to before me this  
24 day of January, 2024

  
Notary Public